

Attachment C  
Docket Nos. 09A-324E &  
09A-325E  
Decision No. C10-1332  
Page 1 of 2



RUSSELL W. KEMP  
303 • 628 • 3624 (direct)  
rkemp@irelandstapleton.com

December 6, 2010

**VIA FACSIMILE AND REGULAR MAIL**

David A. Beckett  
First Assistant Attorney General  
Public Officials/PUC Unit  
State Services Section  
1525 Sherman Street – 7th Floor  
Denver, CO 80203

Re: Colorado Open Records Act Request ("**CORA**") Dated November 24, 2010 of Blanca Ranch Holdings, LLC and Trinchera Ranch Holdings, LLC (collectively, "**Trinchera**")

Dear Mr. Beckett:

I received your letter dated December 2, 2010 on behalf of your client, the Colorado Public Utilities Commission ("**Commission**"), exercising the Commission's legal right to a seven working day extension of time in which to respond to the above-referenced CORA request of Trinchera. On Friday, December 3, 2010, I left you a voicemail regarding the CORA request and your letter. This letter confirms my voicemail to you.

In your letter, you state that the Commission will attempt to provide Trinchera with a cost estimate for the production of responsive documents and a timetable for the same by December 10, 2010 ("**Statutory Deadline**"). However, Trinchera insists upon the production of all correspondence and calendars covered by its CORA request by the Statutory Deadline, as required by CORA, C.R.S. § 24-72-203(3)(b). Failure to produce such documents may impact Trinchera's rights in various proceedings before the Commission and any delay beyond the Statutory Deadline will harm Trinchera.

In addition, we look forward to receiving your cost estimate for the production of all other responsive documents and a timetable for the production of these documents. Trinchera respectfully requests that you provide the cost estimate and schedule for production of these other documents by December 8, 2010. This timing will allow Trinchera to determine whether it can allow delay beyond the Statutory Deadline for certain other categories of responsive documents in an effort to make the production process as efficient as possible. At this time,

Attachment C  
Docket Nos. 09A-324E &  
09A-325E  
Decision No. C10-1332  
Page 2 of 2

David Beckett  
December 6, 2010  
Page 2

Trinchera is not waiving any right under CORA to have any of the requested documents produced by the Statutory Deadline.

If you have any questions, I can be reached at (303) 623-2700 or [rkemp@irelandstapleton.com](mailto:rkemp@irelandstapleton.com).

Sincerely,

Russell W. Kemp

RWK/msl